

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	CASE NO. 21-60066
GREATER HOUSTON	§	
TRANSPORTATION COMPANY	§	
Debtor	§	
-----	§	
	§	
	§	
	§	CHAPTER 11

CAROL JUSTICE'S MOTION TO ALLOW LIFTING OF BANKRUPTCY STAY
TO THE EXTENT OF APPLICABLE INSURANCE

COMES NOW, Carol Denise Justice, Plaintiff in a personal injury law suit filed in Harris County, Texas, styled, Cause No. 2019-47562; Carol Denise justice v. Jermaine Mills and Greater Houston Transportation Company, In the 215th Judicial District Court of Harris County, Texas and files this her Motion to Allow Lifting of Bankruptcy Stay to the Extent of Applicable Insurance and in support thereof would show as follow:

(1) Carol Denise Justice is the Plaintiff in a personal injury lawsuit filed in Harris County styled Cause No. 2019-47562; Carol Denise Justice v. Jermaine Mills and Greater Houston Transportation Company, In the 215th Judicial District Court of Harris County, Texas. This lawsuit arises out of a motor vehicular collision which occurred on March 21, 2019, which resulted in personal injuries to Carol Denise Justice.

(2) One of the Defendants in Carol Denise Justice's personal injury lawsuit, is the debtor herein, Greater Houston Transportation Company, who owned the vehicle driven by another name defendant in the personal injury law suit filed in Harris County.

(3) There exists for the Debtor herein, Greater Houston Transportation Company, liability insurance, effective on the day of the incident in question, which provides a defense and coverage for the collision in question.

(4) Based on the above, Carol Denise Justice prays for an Order from this Honorable Court allowing the lifting of the automatic bankruptcy stay solely and only to the extent that there exists liability insurance that provides a defense and coverage to Jermaine Mills and Greater Houston Transportation Company.

Respectfully submitted,

BY: /s/ David M. Anderson

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Attorney for Respondent, Carol Justice

CERTIFICATE OF SERVICE

I certify that on the 5th day of August, 2021 a true and correct copy of the foregoing instrument was electronically filed and served via CM/ECF on the following counsel of record:

Martyn B. Hill
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/s/David M. Anderson
David M. Anderson

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ORDER GRANTING THE LIFTING OF THE BANKRUPTCY STAY

BE IT REMEMBERED that on this _____ day of _____, 2021,
Carol Denise Justice's Motion to Lift Bankruptcy Stay came on to be heard by this
Court and the Court having reviewed the pertinent file materials entered by the
United State Bankruptcy Court for the District of Texas finds and so ORDERS that the
bankruptcy stay is hereby lifted and that this lawsuit shall be allowed solely and only
to the extent of Greater Houston Transportation Company's liability insurance.

Signed this _____ day of _____, 2021.

PRESIDING JUDGE